

Kimberlee A. Colbo
HUGHES GORSKI SEEDORF
ODSEN & TERVOOREN, LLC
3900 C Street, Suite 1001
Anchorage, Alaska 99503
Telephone: (907) 274-7522
Facsimile: (907) 263-8320

Attorneys for Defendant State Farm Mutual
Automobile Insurance Company

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

MARK STOWERS,

Plaintiff,

vs.

Case No. _____

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY,

Defendant.

NOTICE OF REMOVAL

TO: UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ALASKA

This notice of defendant State Farm Mutual Automobile Insurance

Company respectfully shows:

HUGHES GORSKI SEEDORF
ODSEN & TERVOOREN, LLC
ATTORNEYS AT LAW
3900 C STREET
SUITE 1001
ANCHORAGE, ALASKA 99503
(907) 274-7522
(907) 263-8320 FAX

1. That on the 1st day of May, 2015, an action was commenced in the Superior Court for the State of Alaska at Anchorage, entitled Mark Stowers v. State Farm Mutual Automobile Insurance Company, Case No. 3AN-15-06754CI. Plaintiff's complaint alleges that the amount in controversy is in excess of \$100,000. Therefore, the amount in controversy is greater than \$75,000, exclusive of interest, costs and fees.

2. That this notice of removal is being filed pursuant to Title 28, United States Code § 1446(a) and (b) within thirty (30) days after receipt by defendants State Farm Mutual Automobile Insurance Company of the Summons and Complaint in the above-referenced action. Service of the Summons was accomplished on State Farm, via service on the Alaska Division of Insurance, on May 6, 2015.

3. This court has original jurisdiction of this action pursuant to Title 28, U.S.C. Section 1332(a), and this action may be removed to United States District Court pursuant to Title 28, U.S.C. Section 1441 and Section 1446(b), in that it is a civil action, the sum in controversy exceeds \$75,000, exclusive of interest and costs, and complete diversity exists between the parties to this lawsuit.

4. On information and belief, at the time this action was commenced, Plaintiff was a resident of either Alaska or Nevada as alleged in the Complaint.

5. At the time this action was commenced, defendant State Farm Mutual Automobile Insurance Company was, and is, a mutual insurance company

HUGHES GORSKI SEEDORF
OJSEN & TERVOOREN, LLC
ATTORNEYS AT LAW
3920 C STREET
SUITE 1201
ANCHORAGE, ALASKA 99503
(907) 274-7322
(907) 263-8320 FAX

organized under the laws of the State of Illinois, with its principal place of business in Bloomington, Illinois.

6. Defendant State Farm Mutual Automobile Insurance Company will pay all costs and disbursements incurred by reason of removal proceedings hereby brought should it be determined that this case is not removable or is improperly removed.

WHEREFORE defendant State Farm Mutual Automobile Insurance Company gives notice that this action formerly pending in the Superior Court for the State of Alaska, Third Judicial District at Anchorage is hereby removed to this court.

DATED at Anchorage, Alaska, this 1st day of June, 2015.

HUGHES GORSKI SEEDORF
ODSEN & TERVOOREN, LLC,
Attorneys for Defendant State Farm
Mutual Automobile Insurance Company

337871

By: 
Kimberlee A. Colbo
ABA No. 9211072
3900 C Street, Suite 1001
Anchorage, AK 99503
Telephone No: (907) 274-7522
Facsimile No: (907) 263-8320
Email: kcolbo@hglawfirm.net

HUGHES GORSKI SEEDORF
ODSEN & TERVOOREN, LLC
ATTORNEYS AT LAW
3900 C STREET
SUITE 1001
ANCHORAGE, ALASKA 99503
(907) 274-7522
(907) 263-8320 FAX

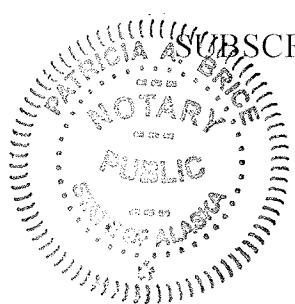
VERIFICATION

STATE OF ALASKA)
)
) ss.
THIRD JUDICIAL DISTRICT)

Kimberlee A. Colbo, being first duly sworn, deposes and states that she is the attorney for State Farm Mutual Automobile Insurance Company, defendant above named; that she knows the contents of this notice of removal and that the same are true and accurate to the best of her knowledge and belief; and that she voluntarily executed the foregoing notice of removal and was fully authorized to do so on behalf of State Farm Mutual Automobile Insurance Company.



Kimberlee A. Colbo



Patricia A. Bruce

Notary Public in and for Alaska
My commission expires: 6/11/2015

I hereby certify that a true and correct copy of the foregoing was served via mail on the 1st day of June, 2015 on:

Jeffrey J. Barber
Barber & Associates, LLC
821 N Street, Suite 103
Anchorage, AK 99501

